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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TERRELL DESHON KEMP, SR.,

Plaintiff,

VS.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, et al.,

Defendants.

CASE NO: 2:18-cv-00169-RFB-BNW

**STIPULATION AND ORDER TO EXTEND
TIME FOR PLAINTIFF TO RESPOND TO
DEFENDANTS HARDY'S AND
SCHMIDT'S MOTION FOR SUMMARY**

(First Request)

COMES NOW, Plaintiff Terrell Deshon Kemp, Sr., (“Plaintiff”), by and through his counsel, Trevor J. Hatfield, Esq. of the law firm of Hatfield & Associates, Ltd., appearing *pro bono publico*, and Defendants Captain Nita Schmidt and Officer Hugh Hardy, (“LVMPD Officers”) by and through their counsel, Lyssa S. Anderson, Esq., of the law firm of Kaempfer Crowell, and hereby stipulate and agree to extend the time for Plaintiff to Respond to Defendants Hardy’s and Schmidt’s Motion for Summary Judgment (ECF #85) due on March 15, 2021, to April 15, 2021.

This request is submitted pursuant to LR IA 6-1, 6-2 and 7-1 and is the parties' first request for an extension of time for Plaintiff to respond to Defendants' Motions for Summary Judgment.

1 Good cause exists for this extension, as the current coronavirus/COVID-19 pandemic has
2 caused, and continues to cause, disruption to the practices of counsel involved in this case. In
3 addition, Plaintiff is incarcerated in Ely State Prison and Plaintiff's Counsel has had difficulty
4 communicating with him to formulate oppositions to Defendants' Motions for Summary Judgment.
5 Additionally, three Motions for Summary Judgment have been filed in this matter and are comprised
6 of voluminous documentation for Plaintiff's counsel and Plaintiff to review to formulate the
7 Oppositions to the Motions for Summary Judgment.
8

9 Accordingly, Plaintiff shall have up to and including April 15, 2021, to respond to
10 Defendant LVMPD Officers' Motion for Summary Judgment (ECF #85).

11 Dated this 12th day of March, 2021

12 Dated this 12th day of March, 2021

13 **HATFIELD & ASSOCIATES**

14 By: */s/ Trevor J. Hatfield*

15 Trevor J. Hatfield, Esq. (SBN 7373)
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13 **KAEMPFER CROWELL**

14 By: */s/ Ryan W. Daniels*

15 LYSSA S. ANDERSON, ESQ. (SBN 5781)
RYAN W. DANIELS, ESQ. (SBN 13094)
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17 Email: landerson@kcnvlaw.com
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18 Attorneys for Las Vegas Metropolitan
Police Department, Captain Nita Schmidt
and Officer Hugh Hardy

19 **IT IS SO ORDERED:**

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29 **RICHARD F. BOULWARE, II**
United States District Judge

30 DATED this 15th day of March, 2021.

1 Dated this 12th day of March, 2021

2 **LEWIS BRISBOIS BISGAARD & SMITH, LLP**

3 */s/ Katherine J. Gordon*

4 By: _____
5 S. Brent Vogel, Esq. (SBN 6858)
6 Katherine J. Gordon, Esq. (SBN 5813)
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11 Email: Katherine.Gordon@lewisbrisbois.com
12 *Attorneys for Defendants NaphCare, Inc.,*
13 *Larry Williamson, M.D., and Ashley Komacsar,*
14 *Director of Nursing*

15 **ORDER**

16 **IT IS SO ORDERED:**

17

18 UNITED STATES MAGISTRATE JUDGE

19
20 Dated: _____
21 CASE NO.: 2:18-cv-00169-RFB-BNW